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Third Party Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING , LLC, a
Delaware limited liability company; GUY
KOREN, an individual; POTATO CORNER
LA GROUP, LLC, a California limited
liability company; NKM CAPITAL GROUP,
LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld, Jr.

**JOINT STATUS REPORT ON
SETTLEMENT AND IN
RESPONSE TO DKT. 338**

Pre-trial Conference

Date: January 9, 2026

Time: 8:30 a.m.

Place: 6C

Trial

Date: January 20, 2026

Time: 8:00 a.m.

Place: 6C

1 liability company; HLK MILPITAS, LLC, a
2 California, limited liability company; GK
3 CERRITOS, LLC, a California, limited
4 liability company; J&K PC TRUCKS, LLC,
5 a California limited liability company; and,
6 GK CAPITAL GROUP, LLC, a California
7 limited liability company and DOES 1
8 through 100, inclusive,

9 Defendants.

10 PCJV USA, LLC, a Delaware limited
11 liability company; PCI TRADING LLC, a
12 Delaware limited liability company;
13 POTATO CORNER LA GROUP LLC, a
14 California limited liability company; GK
15 CAPITAL GROUP, LLC, a California
16 limited liability company; NKM CAPITAL
17 GROUP LLC, a California limited liability
18 company; and GUY KOREN, an individual,

19 Counter-Claimants,

20 v.

21 SHAKEY'S PIZZA ASIA VENTURES,
22 INC, a Philippines corporation,

23 Counter Defendant.

24 PCJV USA, LLC, a Delaware limited
25 liability company; PCI TRADING LLC, a
26 Delaware limited liability company;
27 POTATO CORNER LA GROUP LLC, a
28 California limited liability company; GK
CAPITAL GROUP, LLC, a California
limited liability company; NKM CAPITAL
GROUP LLC, a California limited liability
company; and GUY KOREN, an individual,

Third Party Plaintiffs,

v.

PC INTERNATIONAL PTE LTD., a
Singapore business entity; SPAVI
INTERNATIONAL USA, INC., a California
corporation; CINCO CORPORATION, a
Philippines corporation; and ROES 1 through
10, inclusive,

Third Party Defendants.

JOINT STATUS REPORT

I. JUDGE STONE

On December 10, 2025, the Court ordered Judge Stone to provide “a further status report with a date by which he expects to conclude his investigation and report.” Dkt. 338 at 3. On December 18, 2025, Judge Stone reiterated to the parties his desire to continue to assist them with the ongoing discussions to resolve their disputes.¹ Judge Stone recognizes that to continue to delve into any purported misconduct by or among the parties and their counsel is inconsistent with efforts to settle the case. Additionally, he does not believe his schedule currently permits him to invest the time necessary to investigate the issues of concern thoroughly and comprehensively but that he is happy to revisit these issues after the holidays.

II. SETTLEMENT DISCUSSIONS

The parties also wish to inform the Court about their ongoing settlement discussions. The principals of the parties and their attorneys continue to meet on a weekly basis (and the attorneys have been speaking regularly) and have been exchanging settlement offers that contemplate a global resolution of all disputes, including this action. The latest settlement offer was exchanged December 19, 2025. The parties continue to work to exhaust all efforts to resolve this matter.

III. EMERGENCY ISSUES – REQUEST FOR SHORT CONTINUANCE

Defendants wish to bring to the Court’s attention a few matters. Tragically, Defendants’ lead counsel’s (Todd Malynn) 24-year-old niece passed away, and Mr. Malynn is flying to Ohio tomorrow (Saturday, December 20) to attend her funeral and spend the time needed with his family. Additionally, and before the Court issued its December 4, 2025 Order re-setting the Pre-Trial Conference and Trial dates in this action, Mr. Malynn had a required surgery scheduled for January 6, 2026, which surgery his oncology and endocrinology team have advised would take at least one week to recover

¹ A copy of Judge Stone’s email to the parties is attached at Exhibit 1.

1 from. Mr. Malynn is a pivotal member of the defense team, and the only member who is
2 a trademark attorney. Not as severe, the spouse of the other member of the defense team
3 (Arash Beral) recently suffered a fractured ankle and Mr. Beral is supporting childcare
4 matters over the next few weeks as his young children (ages 9, 6, and 3) are home from
5 school.

6 On December 19, counsel for Defendants spoke with counsel for Plaintiff about
7 these issues and explored whether the parties would be open to reasonable continuances
8 and accommodations. Counsel for Plaintiff stated that he has no objection to any such
9 request. Therefore, and in light of counsel for Plaintiff's gracious support (alongside the
10 parties' meaningful coinciding efforts at resolving their disputes), Defendants
11 respectfully request a reasonable 2-3 week continuance (as the Court may permit) of the
12 December 29 filing deadline, the January 9 Pre-Trial Conference, and the January 20
13 Trial. The continuance will also aid Defendants in reviewing and assessing Plaintiff's
14 updated Memorandum of Contentions of Fact & Law, and its impact on the pre-trial
15 documents.

16
17 Respectfully submitted,

18 Dated: December 19, 2025

FOX ROTHSCHILD LLP

19
20 */s/ John Shaeffer*

21 John Shaeffer

22 Matthew Follett

Meeghan H. Tirtasaputra

Attorneys for Plaintiff and Counterclaim

23 Defendant SHAKEY'S PIZZA ASIA

24 VENTURES, INC. and Third Party Defendants

CINCO CORPORATION, PC

25 INTERNATIONAL PTE LTD., and SPAVI

INTERNATIONAL USA, INC

1 Dated: December 19, 2025

BLANK ROME LLP

2
3 /s/ Arash Beral

Todd M. Malynn

4 Arash Beral

Jamison T. Gilmore

5 Attorneys for Defendants, Counterclaimants,
6 and Third Party Plaintiffs
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ATTESTATION PURSUANT TO LOCAL RULE 5-4.3.4

Pursuant to Local Rule 5-4.3.4, the filer attests that all signatories listed, and on whose behalf the filing is submitted, concurs in the filing's consent and have authorized the filing.

Dated: December 19, 2025

BLANK ROME LLP

/s/ Arash Beral

Todd M. Malynn

Arash Beral

Jamison T. Gilmore

Attorneys for Defendants,
Counterclaimants, and Third Party
Plaintiffs

CERTIFICATE OF SERVICE

The undersigned certifies that on December 19, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's Electronic Case Filing (ECF) system.

I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on December 19, 2025.

By: /s/Ann Grosso